

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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128

JOHN RICHARD JAE,
Plaintiff,

vs.

KENNETH D. KYLER, et al.,
Defendants.

JUDGE'S COPY

FILED
HARRISBURG

JUN 27 2001

MARY E. D'ANDREA, CLERK
Per 1/8
DEPUTY CLERK

CIVIL No. 1-00-0000
U.S. District Judge
in State of Pa.

AMENDED MOTION FOR STAY AND AMENDED BRIEF IN SUPPORT

Comes now, the Plaintiff & his counsel in the above entitled Civil Action John Richard Jae, as a Layman Unlettered in the Arts & Sciences of the Law Legal Procedures within the United States & now files his Amended Motion For Stay And Amended Brief In Support, pursuant to Fed. R. Rule 56(a), herein & who avers & states:

1. Plaintiff now hereby incorporates herein by reference herewith same, all of the facts, arguments & citations of authorities of initial Motion For Stay And Brief In Support, as has been A herein this case, in or about

2. Plaintiff now hereby amends his Motion For Stay And Brief In Support and avers that this Court should stay all further proceedings in this case additionally because Plaintiff is filing in amended with this motion, his Motion To Compel Discovery and Brief In Support, herein this case, and this Court will need time to consider & rule on such & the this Plaintiff will need time to review the Discovery materials once produced in full.


II. AMENDED BRIEF IN SUPPORT

Plaintiff avers & submits that, Fed. R. Civ. P. 56(a), still should be given in the affidavits of a party opposing the motion that the party cannot for reasons stated presently affirmatively establish that the party opposing the motion cannot obtain a continuance to permit affidavits to be obtained and discovery to be taken and discovery to be taken may make such other order as is just.

(U) HEREFORE, based upon the foregoing facts & citations of authorities, herein, as well as the facts & arguments & citations of authorities, as set forth in his initial motion for stay and brief in support, Plaintiff John Richard Doe, prays that this Court will enter an order staying all further proceedings in this matter, case sub. judge until August 1, 2001.

AND HE SHALL EVER PRAY
RESPECTFULLY SUBMITTED

(S)


MR. JOHN RICHARD DOE
#BQ-3211
SCI-Greene/PMU
175 Progress Drive
Waynesburg, PA 15370
Plaintiff and PG Se Cause

Dated: 21st JUNE 2001